

Mr M.Porter
 Arun District Council
 Development Control
 1, Arun Civic Centre Maltravers Road
 Littlehampton
 West Sussex
 BN17 5LF

Our ref: HA/2008/104302/01-L01
Your ref: BR/138/08/
Date: 23 July 2008

Dear Mr Porter,

SUB DIVISION OF EXISTING DWELLING AS TWO HOUSES.

1 STANFORD CLOSE, BOGNOR REGIS

Thank you for referring the above application which was received on **4 July 2008**. Please quote our reference number on any correspondence.

We **OBJECT** to this application on the following grounds:

The Flood Risk Assessment (FRA) submitted for this development does not adequately consider flood risk in accordance with the requirements of Planning Policy Statement 25 – Development & Flood Risk (PPS 25). The applicant has therefore failed to demonstrate that the flood risks resulting from this development can be safely managed.

The flood risk information submitted in support of the application is not acceptable to the Environment Agency for the following reasons:

- The FRA identifies the site as being located in Flood zone 3b (Functional Floodplain). This should be further considered as it may not be correct;
- The FRA classifies the development as a Minor Extension. This is incorrect as PPS 25 clearly outlines that the sub-division of a house should not be categorised in this manner;
- The FRA does not consider how the occupants or development will remain safe in flood conditions over the next 100 years; &
- The FRA concludes that a review of the strategy should occur when the effects of climate change and or flooding become notable events. The Agency would highlight that across the country there have already been notable events which has caused widespread flooding. The FRA should therefore fully consider the impact of climate change at this site and PPS25 gives guidance on how this should occur.

Environment Agency
 Guildbourne House Chatsworth Road, Worthing, West Sussex, BN11 1LD.
 Customer services line: 08708 506 506
 Email: enquiries@environment-agency.gov.uk
www.environment-agency.gov.uk

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The absence of an adequate FRA is sufficient reason in itself for a refusal of planning permission in this instance. This reflects the precautionary approach to development in flood risk areas set out in paragraph 10 of PPS 25.

The following links contain further information regarding development and flood risk which will be helpful to you:

<http://www.communities.gov.uk/documents/planningandbuilding/pdf/pps25practiceguide.pdf>

www.pipernetworking.com

We will provide you with bespoke comments within 21 days of receiving formal re-consultation. Our objection will be maintained until an adequate FRA has been submitted.

I trust that the above comments are satisfactory but if you require any further information please contact me.

Yours sincerely,

Mr David Reynolds
Senior Sustainable Development Planner

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cc HDA Products Ltd